

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES)	
)	
)	
v.)	Docket No. 1:19-cr-10459-RWZ
)	
RAEKWON PARIS)	
)	

**DEFENDANT RAEKWON PARIS' MOTION TO MODIFY THE CONDITIONS OF HIS
SUPERVISED RELEASE TO ENABLE HIM TO SPEND ONE NIGHT WITH HIS
CHILDREN FOR HIS SON'S FIFTH BIRTHDAY**

The Defendant, Raekwon Paris, respectfully requests that this Honorable Court modify the conditions of his supervised release to permit him to spend one night – Saturday, July 24, 2021 – with his son for his birthday. Probation defers to the Court on this motion. In support thereof he states as follows:

1. Mr. Paris is currently on supervised release per the terms of his Amended Judgment and, until August 19, 2021, is on Home Confinement (Document 1869), with electronic monitoring (Document 1907).
2. One of his children, his oldest son, has a birthday on Saturday, July 24, 2021, and will be turning 5 years old. When Mr. Paris asked him what he wanted for his birthday, he said he wanted him (Mr. Paris) to sleep over at his house. Mr. Paris would like to be able to do this for and with his son, and asks to be allowed to leave his home so that he can be with this child (and his other family) from 2 pm on July 24, until 10 am on July 25, 2021.
3. Mr. Paris' three young sons, including this child, live with their mother, in New Bedford. This is where Mr. Paris would be during this period, if his motion is allowed.
4. Mr. Paris has not had any issues with respect to compliance with the terms of his supervised release.
5. Mr. Paris' Probation Officer, Marlenny Ramdehal, has indicated that she defers to the Court with respect to the granting of this request. The government has indicated that it defers to probation.
6. Based on the above, Mr. Paris respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/ Inga S. Bernstein

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Dated: July 21, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on this date upon the attorney of record for each party by electronic filing.

/s/ Inga S. Bernstein

Inga S. Bernstein